

Exhibit B

DECLARATION OF BRANDON J.B. BOULWARE

I, Brandon J.B. Boulware, declare as follows:

1. I am a partner at the law firm of Boulware Law LLC in Kansas City, Missouri, and counsel for the Plaintiffs and the Classes in *Burnett et al. v. National Association of Realtors*, 19-cv-00332 (W.D. Mo.) and *Gibson et al. v. National Association of Realtors*, 23-cv-00788 (W.D. Mo.).

2. In *Burnett*, the Court appointed my law firm and our co-counsel to represent the certified litigation Class as well as nationwide settlement Classes.

3. In *Gibson*, the Court appointed my law firm and our co-counsel to act as interim class counsel on behalf of the putative nationwide class. The appointment includes being “responsible for any settlement negotiations with Defendants that would propose to resolve claims on a class-wide or aggregate basis.” *Gibson*, 23-cv-00788, at Dkt. 180 (May 14, 2024 Order). eXp is one of the Defendants in the *Gibson* case.

4. On October 8, 2024, my co-counsel, Eric Dirks, and I had a phone call with counsel for the Plaintiffs in *1925 Hooper LLC v. National Association of Realtors*, 23-cv-05392 (N.D. Ga.).

5. During the October 8 call, counsel for the *Hooper* Plaintiffs stated that in negotiating a settlement with eXp the *Hooper* Plaintiffs did not consider eXp’s cash on hand, amount of eXp’s cash equivalents, or eXp’s lack of debt.

6. Counsel for the *Hooper* Plaintiffs also stated that eXp had not informed them that we, as interim class counsel in *Gibson*, have had regular and active settlement negotiations with eXp, including an in-person mediation in Del Mar, California.

7. Counsel for the *Hooper* Plaintiffs also stated that, if the court in the Northern District of Georgia preliminarily approves their settlement with eXp and class notice plan, the *Hooper* Plaintiffs planned to use a class administrator different than the one used in *Burnett* and *Gibson*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of October 2024, in Kansas City, Missouri.

/s/ Brandon J.B. Boulware
BRANDON J.B. BOULWARE